

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 461 & 1297

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER
(I) AUTHORIZING THE DEBTORS TO (A) REJECT CERTAIN UNEXPIRED LEASES
EFFECTIVE AS OF DECEMBER 31, 2024 AND (B) ABANDON CERTAIN PERSONAL
PROPERTY AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 9, 2024, the Court entered an *Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases* (D.I. 461) (the “**Lease Rejection Procedures Order**”).

2. Pursuant to the Lease Rejection Procedures Order, on December 2, 2024, the Debtors filed the *Eighth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property)* (D.I. 1297) (the “**Eighth Rejection Notice**”). Attached to the Eighth Rejection Notice was a proposed form of order approving the Eighth Rejection Notice

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

and authorizing the Debtors to reject certain unexpired leases effective as of December 31, 2024 (the “**Proposed Order**”).

3. The deadline to object to each of the Eighth Rejection Notice was December 16, 2024, at 4:00 p.m. (ET). The Debtors received no objections to the Eighth Rejection Notice. Since filing the rejection notices, the Debtors have removed certain leases from the proposed list of rejected leases, without prejudice.

4. The hereto as **Exhibit A** is the Proposed Order with a revised schedule of rejected leases, which discloses which leases were removed from the schedule. No other substantive changes were made to Proposed Order.

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WHEREFORE, the Debtors respectfully request that the Court enter the order attached hereto as **Exhibit A** at its earliest convenience.

Dated: December 29, 2024
Wilmington, Delaware

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